

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

LESLIE GREER
Plaintiff

v.

**EDK Allen II LP, EDK Allen II GP,
LLC, EDK Allen III LP, EDK Allen
III GP, LLC, and Las Piramides Inc.
d/b/a Mexigo Restaurant Bar and
Grill**
Defendants

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**Case No. 4:10cv1
(Judge Schneider/Judge Mazzant)
Complaint for Accommodation
Discrimination Under the A.D.A.**

**APPENDIX IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES,
COSTS AND EXPENSES AGAINST DEFENDANTS AND BRIEF IN SUPPORT**

Respectfully submitted June 16, 2011 by,

/s/ Palmer D. Bailey

Mr. Palmer D. Bailey
Attorney-in-charge
Bar Card No. 01533400
Law Office of Palmer Bailey, A Professional Corporation
16633 Dallas Parkway, Ste. 600
Addison, TX 75001
Tel. 972.588.1863
Fax. 972.588.1801
Inlight226@aol.com

Attorney for Plaintiff

Certificate of Conference

None of the Defendants in this case are represented by counsel. One has already been defaulted for failure to appear or respond, and the remaining defendants have failed to respond to the orders of this Court to get counsel. Therefore no other party could be

**APPENDIX IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES,
COSTS AND EXPENSES AGAINST THE DEFENDANTS**

contacted to determine whether they oppose this motion, but the Plaintiff assumes that they do.

/s/Palmer D. Bailey
Palmer D. Bailey

Certificate of Service

I hereby certify that a copy of this document was placed in the mail on June 16, 2011 properly addressed to the last known address of the EDK Defendants through

Ed Koshnoudi, President
EDK Investments GP
1713 Cottonwood Valley Circle S.
Irving, Texas 75038

And to Las Priamides, Inc. d/b/a Mexigo Restaurant Bar and Grill by mailing to
Jose Jaimes
533 W. McDermott Drive
Allen, TX 75002

/s/ Palmer D. Bailey
Palmer D. Bailey

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LESLIE GREER

Plaintiff

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Case No. 4:10cv1

Complaint for Accommodation

Discrimination Under the A.D.A.

**EDK Allen II LP, EDK Allen II GP,
LLC, EDK Allen III LP, EDK Allen
III GP, LLC, and Las Piramides Inc.
d/b/a Mexigo Restaurant Bar and
Grill**

III GP, LLC, and Las Piramides Inc. d/b/a Mexigo Restaurant Bar and Grill

Defendants

Affidavit of Fact by Palmer Bailey

I, Palmer D. Bailey, declare:

1. I am an attorney licensed to practice law in this state and I represent Leslie Greer in this action.
2. I have been an attorney for 22years. During that time I have participated as lead or co-counsel in both jury and bench trials in Dallas, Austin and Houston.
3. My practice for the last 10 years has consisted almost exclusively of disability civil rights litigation involving the Americans with Disabilities Act, the Fair Housing Act, and the Rehabilitation Act of 1974. I have been involved in, both class action and individual cases, that involve violations of the Americans with Disabilities Act, the Fair Housing Act, and the Rehabilitation Act of 1974.
4. Prior to the filing of this action, I was named and acted as class counsel in this District in cases that involved virtually identical issues to the ones raised in this case. See e.g. *Leslie Greer, et al. v. Mockingbird Station Partners, L.P., et al.*, Civil Action No. 3:02CV-2324-G, *Josh Whitaker, et al. v. West Village, L.P., et al.*, Civil Action No. 3:03-CV-0411-P, and *Patricia Sapp, et al. v. Post Apartment Homes, L.P., et al*, Civil Action No. 3-03CV 2593B.
5. I am familiar with the fair, reasonable and customary fees charged by similar attorneys in this geographic area for representation in Federal court. The following rates charged by the Law Office of Palmer Bailey, P.C. for its services are well within the range of rates charged for similar services by lawyers and paralegals of comparable skill, experience and reputation for this community for similar work under similar circumstances. Further, the rates being charged in this case are only \$25.00 per hour less than the rates that were awarded by another Northern District Court to this same counsel

***AFFIDAVIT OF FACT AS TO THE ACCURACY OF EXHIBITS AND
REASONABLENESS OF ATTORNEY FEES AND COSTS AND EXPENSES***

more than 3 years ago for work performed between 4 and 5 years ago in, *Floyd Guy Davis, et. al v. Grand Prairie Sports Facilities, et al* 3-06-cv-0744-N.

Palmer Bailey, attorney time. \$375.00 per hour
Paralegal time \$110.00 per hour

All times is billed in 1/10th of an hour increments.

6. I am the custodian of the records for the Law Office of Palmer Bailey, P.C. Attached hereto are the TimeSlip records of the Law Office of Palmer Bailey, P.C. recording the time and the costs expended in the prosecution of this cause.

7. The records were kept in the regular course of business by the Law Office of Palmer Bailey, P.C., and it was the regular course of business of the Law Office of Palmer Bailey, P.C. for an attorney or paralegal of Palmer Bailey, P.C. with knowledge of the act, event, or condition recorded to make the record or to transmit information thereof to be included in such record, and that record was made at or near the time or reasonably soon thereafter.

8. The fair, necessary, reasonable and customary fees, costs and expenses expended and used in the prosecution of the case up through the time of the filing of this Brief is \$23,582.50 as shown by the attached TimeSlips. Appropriate billing judgment has been shown and certain charges have not been included in the final bill. Further, in my professional opinion based upon 10 years of doing this work and enforcing dozens and dozens of orders and agreements to modify including multiple class action consent decrees, it will require no less than an additional 20 hours of time to enforce this Court's order Doc. # 33, which is another \$7,500.00 in time.

9. Therefore the total amount of reasonable and necessary fees in this case is \$31,082.50.

I swear under penalty of perjury under the laws of the United States that the statements in this declaration are true.

Executed this 16th day of June, 2011 in Addison, Texas.

s/ Palmer Bailey
Palmer D. Bailey
Bar Card No. 01533400

***AFFIDAVIT OF FACT AS TO THE ACCURACY OF EXHIBITS AND
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Slip Listing

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Selection Criteria

Slip.Transaction Dat 10/10/2008 - 6/16/2011
 Slip.Classification Open
 Clie.Selection Include: Mexigo Restaurant

Rate Info - identifies rate source and level

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
8610 TIME	Palmer Bailey	0.50	350.00	175.00
7/24/2009	Meeting	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Meeting with client about problems trying to get into site. Blocked parking and paths of travel etc.		0.00		
8722 TIME	Palmer Bailey	1.70	350.00	595.00
8/11/2009	Review	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Reviewing site for problems. Multiple problems everywhere. Not enough parking, bad curb cuts, no route through facility, metal fence to get in restaurant. etc. etc.		0.00		
8723 TIME	Palmer Bailey	0.30	350.00	105.00
8/11/2009	Telephone call	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Telephone call with client about review and problems. Location is new but the shopping center is pre 92 she believes.		0.00		
8731 TIME	Palmer Bailey	0.90	350.00	315.00
8/11/2009	Research	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Researching ownership and platting issues. Changes to platting and multiple different places all seem to have EDK Allen as owners, looking for tdlr issues on any of the properties, and when build		0.00		
8737 TIME	Palmer Bailey	0.10	350.00	35.00
8/12/2009	Draft	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Drafting attorney notes for getting case to filing,		0.00		
8784 TIME	Palmer Bailey	0.10	350.00	35.00
8/18/2009	E-mail	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
E-mail from client about filing and meeting, return email on same		0.00		
8838 TIME	Palmer Bailey	2.60	350.00	910.00
8/25/2009	Research	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Researching ownership issues with all the EDK		0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
entities and with sec of state. Reviwing the increases in property values and researching the dates for the construction of the improvements. Begin drafting the Complaint					
8921	TIME	Palmer Bailey	0.50	350.00	175.00
9/9/2009		Meeting	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Meeting with client about continuig issues and about issues at other retail within the center.			0.00		
8960	TIME	Palmer Bailey	0.10	350.00	35.00
9/11/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting notes to file for getting it completed and what needs to be done/where we are, email to client on same			0.00		
8991	TIME	Palmer Bailey	0.10	350.00	35.00
9/15/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting note to client about filing for the case at the end of the week in response to her question			0.00		
9053	TIME	Palmer Bailey	0.10	350.00	35.00
9/25/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting notes to file no preparation for complaint filig, field call from client on same			0.00		
9067	TIME	Rachel White	0.30	75.00	22.50
9/29/2009		Copy and File	0.00	T@1	
WIP		Mexigo Restaurant	0.00		
prepare copies for court and letter on same for original filing			0.00		
9068	EXP	Palmer Bailey	1	350.00	350.00
9/29/2009		Filing			
WIP		Mexigo Restaurant			
Filing Fee for case					
9066	TIME	Palmer Bailey	1.60	350.00	560.00
9/29/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting complaint final version, all service documents and filing docs. Prepare same for filing			0.00		
9603	TIME	Palmer Bailey	1.30	350.00	455.00
10/1/2009		Meeting	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Meeting with expert on case for site and about what needs to get done			0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
9220	Palmer Bailey	0.10	350.00	35.00
10/2/2009	E-mail	0.10	C@1	
WIP	Mexigo Restaurant	0.00	Do Not Bill	
E-mail from court with complaint and email with cert of int.		0.00		
9221	Palmer Bailey	0.10	350.00	35.00
10/2/2009	E-mail	0.10	C@1	
WIP	Mexigo Restaurant	0.00	Do Not Bill	
E-mail from court with summons as prepared for case		0.00		
9149	Palmer Bailey	0.10	350.00	35.00
10/5/2009	E-mail	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
E-mail from court with summons filed and ready for service		0.00		
9150	Palmer Bailey	0.10	350.00	35.00
10/5/2009	Draft	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Drafting notes to get the case moved forward with service, contact process server on same		0.00		
9156	Palmer Bailey	0.10	350.00	35.00
10/5/2009	E-mail	0.10	C@1	
WIP	Mexigo Restaurant	0.00	Do Not Bill	
E-mail from client about filing and service, explain where we are.		0.00		
9185	Palmer Bailey	0.40	350.00	140.00
10/8/2009	Telephone call	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Telephone call with ADA expert about issues that need to be fixed and issues about the filing with TDLR		0.00		
9222	Palmer Bailey	0.20	350.00	70.00
10/13/2009	Review	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Reviewing returned summons. Prepare same for service with lawyers civil		0.00		
9223	Palmer Bailey	0.20	350.00	70.00
10/13/2009	Prep Pleadings	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Preparation of pleadings for service with letter and copies		0.00		
9253	Palmer Bailey	0.10	350.00	35.00
10/16/2009	Draft	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Drafting notes to file for things to get done during discovery		0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
9264	TIME	Palmer Bailey	0.10	350.00	35.00
10/16/2009		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
E-mail to client about filing coming through and the service issue, general update at her request			0.00		
9269	TIME	Palmer Bailey	0.10	350.00	35.00
10/16/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from summons server that EDK got served today			0.00		
9294	TIME	Palmer Bailey	0.10	350.00	35.00
10/21/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from adjuster from Mexigo asking for complaint?? He needs to call his client.			0.00		
9375	TIME	Palmer Bailey	0.10	350.00	35.00
10/29/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes to file to update what needs to get done on this case			0.00		
9353	TIME	Rachel White	0.10	75.00	7.50
10/29/2009		Filing	0.00	T@1	
WIP		Mexigo Restaurant	0.00		
Filing documents from court			0.00		
9396	TIME	Palmer Bailey	0.40	350.00	140.00
10/29/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with expert as initial contact on case, discuss issues and hiring			0.00		
9376	TIME	Palmer Bailey	0.10	350.00	35.00
10/29/2009		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from client and return same with more updates and discussion of answer date			0.00		
9346	TIME	Palmer Bailey	0.10	350.00	35.00
10/29/2009		Review	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
Reviewing bill from service officer for EDK entities			0.00		
9345	TIME	Palmer Bailey	0.10	350.00	35.00
10/29/2009		Review	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Reviewing returned summons for edk with Answer due early November			0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
9349 EXP	Palmer Bailey	1	125.00	125.00
10/29/2009	Service Fee			
WIP	Mexigo Restaurant			
Service Fee for Mexigo owner out of county				
9347 EXP	Palmer Bailey	1	115.00	115.00
10/29/2009	Service Fee			
WIP	Mexigo Restaurant			
Service Fee for EDK entities				
9348 TIME	Palmer Bailey	0.10	350.00	35.00
10/29/2009	Review	0.10	C@1	
WIP	Mexigo Restaurant	0.00	Do Not Bill	
Reviewing returned summons for Mexigo owner with answer due early November		0.00		
9444 TIME	Palmer Bailey	0.10	350.00	35.00
11/5/2009	Telephone call	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Telephone call from client asking about the answer date and the case		0.00		
9457 TIME	Palmer Bailey	0.10	350.00	35.00
11/6/2009	Draft	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Drafting attorney notes to file on what needs to get done on case for next week after answer		0.00		
9536 TIME	Palmer Bailey	0.10	350.00	35.00
11/10/2009	Review	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Reviewing hard copy answer from defendants		0.00		
9478 TIME	Palmer Bailey	0.10	350.00	35.00
11/11/2009	Telephone call	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Telephone calls to court to find out what to do about the filing where it was sent to northern with an eastern address etc.		0.00		
9479 TIME	Palmer Bailey	0.20	350.00	70.00
11/11/2009	Telephone call	0.00	C@1	
WIP	Mexigo Restaurant	0.00		
Telephone call to def counsel for edk and they return same on situation and what to do, and the non-answer of Mexigo		0.00		
9521 TIME	Palmer Bailey	0.10	350.00	35.00
11/20/2009	E-mail	0.10	C@1	
WIP	Mexigo Restaurant	0.00	Do Not Bill	
E-mail to client with update from calls and about the fix		0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
9520	TIME	Palmer Bailey	0.10	350.00	35.00
11/20/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call to court about the transfer etc.			0.00		
9519	TIME	Palmer Bailey	0.30	350.00	105.00
11/20/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call again to def counsel this time a conference call on the issues			0.00		
9517	TIME	Palmer Bailey	0.10	350.00	35.00
11/20/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call to Blume def office, left message about the filing etc.			0.00		
9548	TIME	Palmer Bailey	0.50	350.00	175.00
11/24/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting letter to def counsel about settlement and court order. Contact with client on case and settlement			0.00		
9561	TIME	Palmer Bailey	0.10	350.00	35.00
11/25/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting notes to update attorney file for what needs to get done on case			0.00		
9562	TIME	Palmer Bailey	0.10	350.00	35.00
11/25/2009		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from and back to client on case update for where we are on court order etc.			0.00		
9595	TIME	Palmer Bailey	0.20	350.00	70.00
12/7/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with def counsel about issues of transfer and settlement and no answer from Mexigo.			0.00		
9623	TIME	Palmer Bailey	0.30	350.00	105.00
12/10/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from client with extensive questions about moving the case, and why we don't have an answer from the restaurant, she wants a default etc. she wants them to admit they are wrong.			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
9649	TIME	Palmer Bailey	0.10	350.00	35.00
12/11/2009		Draft	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
Drafting attorney notes to file with update			0.00		
9630	TIME	Palmer Bailey	0.40	350.00	140.00
12/11/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting letter to counsel about settlement, 26f and default			0.00		
9653	TIME	Palmer Bailey	0.10	350.00	35.00
12/14/2009		Fax	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
fax from def about 26f and non-response from their tenant Mexigo and Motion to transfer			0.00		
9664	TIME	Palmer Bailey	0.10	350.00	35.00
12/15/2009		Draft	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
Drafting additional notes on file for time frames to get something from them or default Mexigo.			0.00		
9681	TIME	Palmer Bailey	0.20	350.00	70.00
12/18/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting notes to file after talking with client about still not having an Answer from Mexigo and no new information, I am going to file a default next week and motion to transfer.			0.00		
9701	TIME	Palmer Bailey	1.30	350.00	455.00
12/22/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting entry of default, getting and filing summons, prepare aff. for filing same, Also prepare mtn to transfer, letter to opposing counsel on same. Never heard from them about Mexigo or about the scheduling order meeting. Never hear back from them.			0.00		
9719	TIME	Palmer Bailey	0.10	350.00	35.00
12/23/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call again left another message on the motion and Mexigo			0.00		
9721	TIME	Palmer Bailey	0.10	350.00	35.00
12/23/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting update to attorney file for the motions and the default and where we are on this			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
9727	TIME	Palmer Bailey	0.10	350.00	35.00
12/28/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call message from Shelly skeen and returned call to leave another message on the motion			0.00		
9731	TIME	Palmer Bailey	1.60	350.00	560.00
12/28/2009		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting update to motions and default request after receiving mt to w/draw from opposing counsel. contact court on same. Multiple filings come in, and fax from opposing counsel.			0.00		
9741	TIME	Palmer Bailey	0.10	350.00	35.00
12/28/2009		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with filing of request for default to clerk			0.00		
9742	TIME	Palmer Bailey	0.10	350.00	35.00
12/28/2009		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
E-mail from court regarding motion to transfer case			0.00		
9735	TIME	Palmer Bailey	0.30	350.00	105.00
12/29/2009		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone calls to opposing counsel again, about w/drawal and ct scheduling order due. Call to court on same and issue of transfer, speak with clerk. review letter to court for courtesy copy.			0.00		
9737	TIME	Palmer Bailey	0.10	350.00	35.00
12/29/2009		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court clerk with notice of default filed.			0.00		
9738	TIME	Palmer Bailey	0.10	350.00	35.00
12/29/2009		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
E-mail from Judge Lynn's office with information about the pending transfer			0.00		
9739	TIME	Palmer Bailey	0.10	350.00	35.00
12/29/2009		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
E-mail from court with order granting the transfer to the Eastern District.			0.00		
9743	TIME	Palmer Bailey	0.10	350.00	35.00
12/29/2009		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
E-mail from court with notice of closure and need to file in Eastern District from here forward.			0.00		
9843	TIME	Palmer Bailey	0.10	350.00	35.00
1/5/2010		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	Do Not Bill	
E-mails from court with notice info and judge assignment.			0.00		
9799	TIME	Palmer Bailey	0.10	350.00	35.00
1/7/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call to counsel about court order and their attempt to w/draw etc.			0.00		
9802	TIME	Palmer Bailey	0.10	350.00	35.00
1/7/2010		Review	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Reviewing extensive requirements from court about meeting and all the details from eastern district			0.00		
9798	TIME	Palmer Bailey	0.10	350.00	35.00
1/7/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with order to meet on or before the 26th.			0.00		
10007	TIME	Palmer Bailey	0.10	375.00	37.50
1/12/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with mtn to withdraw			0.00		
9845	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		E-mail	0.10	C@1	
WIP		Mexigo Restaurant	0.00	No Charge	
E-mail from northern district concerning case closing			0.00		
9844	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with information about assignment to magistrat			0.00		
9832	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		Review	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Reviewing mail from opposing counsel with letter to court about mtn to withdraw			0.00		
9835	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
E-mail from court with notice of deficiency for filing on the motin to withdraw			0.00		
9834	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with motion to withdraw filed			0.00		
9833	TIME	Palmer Bailey	0.10	375.00	37.50
1/14/2010		Fax	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
fax from opposing counsel with new motion to withdraw filed in eastern district			0.00		
9852	TIME	Palmer Bailey	0.10	375.00	37.50
1/15/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court mooting the motion to withdraw by def counsel			0.00		
9853	TIME	Palmer Bailey	0.40	375.00	150.00
1/15/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting another letter to def counsel concerning the withdrawal and the issue of the court ordered meeting coming up very soon.			0.00		
9859	TIME	Palmer Bailey	0.30	375.00	112.50
1/15/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from Wilson about possible representation on the case. email back with explanation of where we are, what is going on and attach the pleading in it.			0.00		
9864	TIME	Palmer Bailey	0.10	375.00	37.50
1/15/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from possible defense counsel about the case			0.00		
9865	TIME	Palmer Bailey	0.10	375.00	37.50
1/15/2010		Fax	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
fax from Def counsel about new motion to withdraw			0.00		
9885	TIME	Palmer Bailey	0.60	375.00	225.00
1/20/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call extensive with Potential new counsel for EDK. Discussing the status, my desire to move forward new parties needed, etc.			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
9940	TIME	Palmer Bailey	0.30	375.00	112.50
2/2/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call after reviewing fax from yet another lawyer, putnam, called client on same for settlement issues nad then left message with lawyer			0.00		
9943	TIME	Palmer Bailey	0.30	375.00	112.50
2/2/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from joe putnam, discuss terms of settlement in general and give background on the case. I will get him an offer on this case in letter form.			0.00		
9956	TIME	Palmer Bailey	0.90	375.00	337.50
2/8/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting letter on settlment after discussing at length with client on same.			0.00		
9989	TIME	Palmer Bailey	0.10	375.00	37.50
2/10/2010		Fax	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Fax from previous defense counsel about getting in touch with defendant EDK			0.00		
9993	TIME	Palmer Bailey	0.10	375.00	37.50
2/11/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with notice from EDK on owner			0.00		
9995	TIME	Palmer Bailey	0.10	375.00	37.50
2/11/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail again from court ordering defendant to obtain counsel within 30 days			0.00		
10002	TIME	Palmer Bailey	0.10	375.00	37.50
2/11/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call to Putnam on case and court, order			0.00		
10036	TIME	Palmer Bailey	0.20	375.00	75.00
2/19/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with Putnam discuss at length issues, and he says the person is looking for another lawyer etc.			0.00		
10070	TIME	Palmer Bailey	0.20	375.00	75.00
3/1/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
Telephone call with putnam again. Let them know he needs to get counsel and move forward, I am going to take a default judgment against the tenant, and I am getting my expert out there etc.			0.00		
10179	TIME	Palmer Bailey	0.10	375.00	37.50
3/16/2010		Review	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Reviewing proof of service as filed with March 15th date of signing by Koshnadi			0.00		
10180	TIME	Palmer Bailey	0.30	375.00	112.50
3/16/2010		Research	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Researching order and effect of failing to comply with 30 day requirements for new counsel. Called previous lawyer left message, called court asst on same.			0.00		
10181	TIME	Palmer Bailey	0.30	375.00	112.50
3/16/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone calls to court again and to magistrate trying to sort out what to do on this matter with no answer and 30 days run I just don't know what to do			0.00		
10195	TIME	Palmer Bailey	0.20	375.00	75.00
3/17/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with order on appearance again to defendants. Appears to be mailing same order out with no new requirement. We're already outside the 30 days. File same, contact client			0.00		
10196	TIME	Palmer Bailey	0.10	375.00	37.50
3/17/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail again from court with notice of filing of the order, no other documents in email,			0.00		
10216	TIME	Palmer Bailey	0.30	375.00	112.50
3/20/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from client on Saturday on my cell asking what is going on with case and wondering why not moving forward. Explaining again the situation with no counsel and default			0.00		
10336	TIME	Palmer Bailey	0.30	375.00	112.50
4/1/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes after call from cleint about what the Court orders mean, may need to call court, still no lawyer on the other side to deal with,			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
contact with expert about review,					
10370	TIME	Palmer Bailey	0.10	375.00	37.50
4/7/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with acknowledgment again of receipt for service			0.00		
10486	TIME	Palmer Bailey	0.30	375.00	112.50
4/29/2010		Review	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Review orders, contact cleint and court about no answer, no response from the Defendants on the case, can't move forward			0.00		
10581	TIME	Palmer Bailey	0.10	375.00	37.50
6/7/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from client about update on case. Email with only info I have at this point			0.00		
10666	TIME	Palmer Bailey	0.10	375.00	37.50
6/16/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting atty nottes to file to update what needs to get done on case			0.00		
10788	TIME	Palmer Bailey	0.10	375.00	37.50
7/7/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes to file update with what needs to happen on case			0.00		
10818	TIME	Palmer Bailey	0.30	375.00	112.50
7/16/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with ken about the problems with the case and how to move forward with mtn sj if answer struck and how to get place fixed with no counsel.			0.00		
10841	TIME	Palmer Bailey	1.70	375.00	637.50
7/22/2010		Meeting	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Meeting with client at location to discuss the problems in the case and where we are. Reviewing the changes if any for purposes of filing mtn to strike answer.			0.00		
10857	TIME	Palmer Bailey	0.30	375.00	112.50
7/23/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting atty notes to file on case for updating situation for how to get it resolved. discuss			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
possibilities with lawyer, robert lamb on how to move case					
10911	TIME	Palmer Bailey	0.10	375.00	37.50
8/4/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with filing			0.00		
10908	TIME	Palmer Bailey	1.20	375.00	450.00
8/4/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting status report for court, going over the case file and order, preparing same on where the defendants are and what they aren't doing.			0.00		
10988	TIME	Palmer Bailey	1.10	375.00	412.50
8/17/2010		Research	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Researching the information for a motion to strike. Begin to draft same.			0.00		
11044	TIME	Palmer Bailey	1.40	375.00	525.00
8/26/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting motion to strike answer. going through the record and the court orders and drafting the document.			0.00		
11059	TIME	Palmer Bailey	1.10	375.00	412.50
8/27/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting changes and modifications to the motion and the order, call to dist. clerk on the copies and other issues for filing, file same.			0.00		
11061	TIME	Palmer Bailey	0.10	375.00	37.50
8/27/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with filing on motion to strike			0.00		
11074	TIME	Palmer Bailey	0.40	375.00	150.00
8/30/2010		E-mail	0.40	C@1	
WIP		Mexigo Restaurant	0.00	No Charge	
E-mail from district clerk concerning order and resending it in a different format. Re draft and refile.			0.00		
11076	TIME	Palmer Bailey	0.10	375.00	37.50
8/30/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with filing today			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
11098	TIME	Palmer Bailey	0.90	375.00	337.50
9/2/2010		Meeting	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Meeting with client concerning motion to strike and motion for default. discuss expert and review with Ken carden as well, how to move forward to collect and enforce			0.00		
11137	TIME	Palmer Bailey	0.20	375.00	75.00
9/14/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting notes about meeting with expert to get review for default judgment, email to expert on same			0.00		
11168	TIME	Palmer Bailey	0.40	375.00	150.00
9/20/2010		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court denying order to strike for sanctions on answer because there is no answer that was wrong when filed? makes no sense. Discussion with ken to try and understand what to do and who to serve discovery on for the case?			0.00		
11194	TIME	Palmer Bailey	0.10	375.00	37.50
9/27/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with Baker about visit to site for this week			0.00		
11251	TIME	Palmer Bailey	0.30	375.00	112.50
10/1/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes on file for update to to do list and call from client on where we are			0.00		
11260	TIME	Palmer Bailey	3.70	375.00	1387.50
10/5/2010		Prep Pleadings	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Preparation of discovery documents to all 4 corporate defendants in the case. draft all, review requirements for default against mexigo in situation with joint and several liability when still in case. Contact with client on same			0.00		
11271	TIME	Palmer Bailey	0.30	375.00	112.50
10/13/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with Joe Putnam again on case and resolution. quick email to client on same.			0.00		
11446	TIME	Palmer Bailey	0.10	375.00	37.50
12/2/2010		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
Telephone call from client on case progress and sj filing			0.00		
11520	TIME	Palmer Bailey	1.20	375.00	450.00
12/17/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting summary judgment brief, begin working on it.			0.00		
11527	TIME	Palmer Bailey	2.70	375.00	1012.50
12/20/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting SJ, finishingup most of the brief. Beggining to punch in the footnotes to create the Appendix. Working on the affidavits and other documents			0.00		
11532	TIME	Palmer Bailey	1.30	375.00	487.50
12/21/2010		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting brief edits and edits and check footnotes.			0.00		
11556	TIME	Palmer Bailey	3.60	375.00	1350.00
1/4/2011		Prep Pleadings	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Preparation of pleadings for partial summary judgment. All of the exhibits, and local rule changes to the briefing, calls to court on same. Make all footnotes for appendix as required., Complete final appendix for all, draft final documents, and order and letter to court, get document ready and file.			0.00		
11560	TIME	Palmer Bailey	0.10	375.00	37.50
1/4/2011		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with filing of motoin			0.00		
11608	TIME	Palmer Bailey	0.80	375.00	300.00
1/14/2011		Meeting	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Meeting with client to discuss where we go from here if no answer as expected, as far as enforcement and timeframes. Complicated with no defendant etc.			0.00		
11612	TIME	Palmer Bailey	0.10	375.00	37.50
1/17/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes to the file to update the case in anticipation of enforcement and collection			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
11672	TIME	Palmer Bailey	0.10	375.00	37.50
2/7/2011		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail to client with update that we are just waiting for court still to rule etc. and where we go from there			0.00		
11756	TIME	Palmer Bailey	0.10	375.00	37.50
2/18/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting attorney notes to file give update to client that we are still waiting and can't move till the court rules.			0.00		
		i			
11782	TIME	Palmer Bailey	0.30	375.00	112.50
2/23/2011		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call with Ken Carden on case and how if any I can move it to a decision now on SJ without any response on file by defendant and enforcement issues.			0.00		
11876	TIME	Palmer Bailey	0.10	375.00	37.50
3/10/2011		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail to client about the court ruling.			0.00		
11982	TIME	Palmer Bailey	0.10	375.00	37.50
3/22/2011		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from client on appeal deadline and motion to dismiss remaining issues.			0.00		
12029	TIME	Palmer Bailey	1.70	375.00	637.50
3/29/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting motion/brief for default, to dismiss and for final judgment. Pulling necessary info.			0.00		
12037	TIME	Palmer Bailey	0.40	375.00	150.00
3/30/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting final touches to document, contact court about response and to let them know it is filed.			0.00		
12138	TIME	Palmer Bailey	0.20	375.00	75.00
4/21/2011		Telephone call	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Telephone call from Beatrice at Mexigo about order from court and discuss issues with the owner			0.00		

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
12165	TIME	Palmer Bailey	0.20	375.00	75.00
5/2/2011		E-mail	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
E-mail from court with Order to modify within 6 months. Discuss same with client.			0.00		
12341	TIME	Palmer Bailey	5.40	375.00	2025.00
6/15/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting brief for motion on fees to court.			0.00		
Reviewing record and pulling law etc.					
12344	TIME	Palmer Bailey	4.90	375.00	1837.50
6/16/2011		Draft	0.00	C@1	
WIP		Mexigo Restaurant	0.00		
Drafting Affidavit, briefing and getting appendix together for filing. Completing all editing and drafts cites footnotes and other materials for filing.			0.00		
Grand Total					
		Billable	62.90		23582.50
		Unbillable	1.80		642.50
		Total	64.70		24225.00

LEGAL SERVICES AGREEMENT

Leslie Greer ("CLIENT"), by this document, agrees to engage the Law Office of Palmer Bailey, p.c. (the "ATTORNEY") to represent him. This representation is against any individuals and/or entities as may be shown by investigation to be responsible for the violation of CLIENT's State and/or Federal rights. These violations involve disability discrimination at the Shopping Center where the Mexigo Restaurant is located in Allen, Texas.

For all Federal law claims, CLIENT agrees that any award of attorney's fees by the Court/arbitrator or agreed to in settlement shall be the sole property of the ATTORNEY. CLIENT agrees to pay, and hereby assigns to The ATTORNEY a lien on, any and all awards to Plaintiff of attorney's fees, including all costs of litigation expenses, and court costs recovered on CLIENT's behalf.

During the prosecution of this cause, The ATTORNEY is authorized to hire or join any additional experts, ATTORNEY or other professionals that they deem appropriate for the prosecution of this matter. Further, The ATTORNEY shall advance all Court costs, deposition costs, duplication costs, telecopier fees, filing fees, runner and travel expenses, long-distance telephone expenses, accountant's fees, appraiser's fees, expert witness fees, consultant's fees, computer research fees and other legal and professional fees necessary for the professional prosecution of this cause. All awards to CLIENT by settlement or judgment of these costs shall be the property of The ATTORNEY and the CLIENT hereby gives a lien to The ATTORNEY on any amounts so awarded.

CLIENT agrees and understands that the overall supervision of the case will be handled by PALMER BAILEY. However, the day-to-day handling of the case, hearings, and communications may be handled by any attorney and/or any other persons or ATTORNEY that may be assigned by PALMER BAILEY to handle specific matters relating to the case.

In computing the ATTORNEY' fees in this matter the CLIENT agrees that the time expended by The ATTORNEY, will be recorded and billed to CLIENT in minimum one-tenth hour increments at the following rates: Attorney's out of court time will be billed at the rate of not less than \$350 per hour. Attorney's in court time will be billed at the rate of not less than \$350 per

hour. Law clerks and legal assistants time will be billed at rates between \$90 and \$120. Further, it is agreed that the recordation of time by the ATTORNEY as described herein shall apply to all work performed on this matter including but not limited to legal research, drafting of pleadings, conferences, telephone conversations, preparation of discoverable documents, investigation of facts, preparation for and appearances in court, and other tasks necessary to adequately handle the matter in controversy.

The ATTORNEY will provide CLIENT a statement setting forth, in summary, time and expenses incurred at any time during the prosecution of this cause within 48 hours of a request by CLIENT. Supporting documents including invoices and time records are available for inspection by CLIENT during normal business hours. All fees and costs are due, and payable upon receipt of funds received in settlement.

CLIENT agrees to keep the ATTORNEY advised of his whereabouts at all times, to cooperate in the investigation, preparation and hearing and/or trial of the case, to appear on reasonable notice for depositions, administrative hearings, and court appearances, and to comply with all reasonable requests made in connection with the preparation and presentation of the claim.

CLIENT agrees not to compromise the claim without the written consent of the ATTORNEY and the ATTORNEY is not authorized to enter into any settlement on behalf of CLIENT without the consent of CLIENT. In the event that CLIENT fails to prosecute this action to final judgment or settlement without first obtaining the agreement of The ATTORNEY or if this cause is dismissed or compromised by court sanction as a result of any failure of CLIENT to fully cooperate in the prosecution of this cause, CLIENT hereby agrees to pay the reasonable ATTORNEY' fees incurred by the ATTORNEY to that date, including all costs of litigation expenses, and court costs.

In the event that a dispute arises between the CLIENT and the ATTORNEY regarding this contract or the work performed under it the CLIENT hereby agrees to arbitrate this matter in Dallas County. Any such arbitration shall be binding and final as to each party.

NO REPRESENTATION HAS BEEN MADE REGARDING WHAT AMOUNT, IF ANY, CLIENT MAY RECOVER IN THIS CLAIM, NOR HAVE ANY WARRANTIES BEEN MADE REGARDING THE OUTCOME OF THIS MATTER. THIS AGREEMENT MAY NOT BE CHANGED EXCEPT BY THE SIGNED AGREEMENT OF BOTH PARTIES.

NOTE: THIS IS OUR ENTIRE AGREEMENT. IT PROTECTS BOTH OF US AND WILL PREVENT MISUNDERSTANDING. IF YOU DO NOT UNDERSTAND IT OR IF IT DOES NOT CONTAIN ALL THE

PERTINENT TERMS YOU BELIEVE HAVE BEEN DISCUSSED, PLEASE CALL IT TO OUR ATTENTION BEFORE SIGNING.

IF YOU HAVE A COMPLAINT ABOUT THE ATTORNEY HANDLING THIS MATTER THE TELEPHONE NUMBER FOR THE STATE BAR OF TEXAS TO MAKE A COMPLAINT IS 1-800-204 -2222.

YOUR SIGNATURE BELOW INDICATES THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS ENTIRE AGREEMENT.

Dated: 9/21/2009

BY: /s/Leslie Greer
Leslie Greer

BY: /s/Palmer D. Bailey
PALMER D. BAILEY